

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLES WILLIAMS

Plaintiff

Docket No. 07 cv 7720
(CM) (RLE)

-against-

AFFIDAVIT

PALLADIA, INC. and CORINE WORKMAN

Defendants

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STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK

Doretha Gilmore, being duly sworn deposes and says:

1. I am the Administrative Assistant for Palladia's facilities known as Dreitzer House ("Dreitzer"), Flora Vista and Chelsea Court and held the same position during Charles Williams' employment as a House Monitor at Dreitzer. My supervisor is Corinne Workman. I submit this affidavit in support of defendants' motion for summary judgment dismissing the action.

2. First, I would like to state that I have worked for Ms. Workman for a number of years and the allegation that she would discriminate against Mr. Williams, or any other employee, because that employee is a man is simply laughable. Ms. Workman typically hires men for the House Monitor position and I am unaware of any man that was terminated from that position or any other position because of his sex.

3. Sometime after 1:00 a.m. on October 31, 2006, I received a call

from Lizzette Dinowsky, who was, on that night, the Security Guard at Flora Vista. Ms. Dinowsky called to say that she had walked over to Dreitzer and could not find Mr. Williams who was on duty that night.

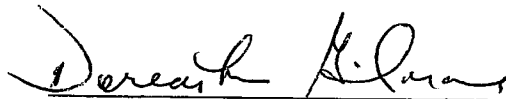
4. I asked Ms. Danowsky to wait around to see if Mr. Williams would show up. About 15 or 20 minutes later she called me again to tell me that she still could not find him, and that she had tried to call his cell phone and received no answer.

5. I told Ms. Danowsky to check the entire building and, if she found Mr. Williams to have him call me. I also tried to call Mr. Williams cell phone myself, but received no answer. I left a message on his cell phone for him to call me when he got the message. Additionally, I also called Ms. Workman's voice mail at the office to tell her what had occurred.

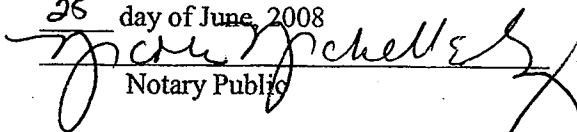
6. Sometime after 3:00 a.m., I received a call from Ms. Danowsky advising me that she saw Mr. Williams at the facility.

7. Although I had directed Ms. Danowsky to have Mr. Williams call me, he never did. Neither on that night or the next day.

8. I don't believe that I saw Mr. Williams thereafter, having been advised that he was terminated.


Doretha Gilmore

Sworn to before me this
25 day of June, 2008


Notary Public

